



U.S. Department  
of Transportation  
**Research and  
Special Programs  
Administration**

400 Seventh St., S.W.  
Washington, D.C. 20590

NOV 26 2001

Mr. Kevin J. O'Brien  
General Manager, Hazmat Policy & Compliance  
Maersk Sealand  
5080 McLester Street  
Elizabeth, NJ 07207

Ref. No: 01-0284

Dear Mr. O'Brien:

This is in response to your October 2, 2001 letter requesting clarification of requirements for completing a dangerous cargo manifest under the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180). Your questions are paraphrased and answered as follows:

Q. Is it necessary for the preparer to sign each page of a 50-page dangerous cargo manifest?

A. No. Location of the signature anywhere on the same page as the certification statement constitutes signing the certification. Only one signed certification is required for a dangerous cargo manifest.

Q. May the shipper use mechanical or electronic means to sign the certification?

A. Yes. Consistent with shipping paper requirements a dangerous cargo manifest may be signed by typewriter or other mechanical means. Use of a typewriter, word processor or computer/printer to produce the signature satisfies this requirement provided the signature is made after the shipping information is entered on the dangerous cargo manifest.

Q. Is one signed certification statement on the cover page of a multi page dangerous cargo manifest acceptable?

A. Yes.

I hope this information is helpful.

Sincerely,

Delmer F. Billings  
Chief, Standards Development  
Office of Hazardous Materials Standards



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# MAERSK SEALAND

October 2, 2001

Mr. E. Pfersich  
 United States Coast Guard  
 Hazardous Materials Standards Branch G-MOS-3  
 2100 Second Street SW  
 Washington, DC 20593-0001

*LaValle*  
*§ 176.30*  
*Dangerous Cargo Manifest*  
*Signature*  
*01-0284*

Re: 49 CFR 176.30(b) – Vessel Dangerous Cargo Manifest Requirements

Dear Manny:

We would appreciate your assistance in clarifying certain CFR requirements on the preparation of the vessel Dangerous Cargo Manifest (DCM). The two main CFR references we are concerned about are 1) 176.30(b) signature of the person who prepared the manifest; and 2) 172.204(d)(2) allowing a shipper to use various means of signing the shipping papers.

Our DCM is generated from a manifest system based on the booking information and a comparison of the shipper's hazardous papers against the booking before the manifest is printed. Our manifest page format pretty much follows the format suggested at IMO including a line for the signature of the DCM preparer whose name is printed in capital letters by the system.

Questions which have come up concerning this process are:

- As some DCM's can be over 50 pages, is it necessary for the preparer to sign each page?
- As shipper's are allowed under 172.204(d)(2) to use mechanical or electronic means to sign the hazardous declaration, will the printing of the DCM preparer's name on each manifest page by the system satisfy 176.30(b)?
- Will just a signed certification statement on the cover page of the DCM satisfy the CFR requirement or must something also appear on each page?

For operational reasons, your prompt response would be very much appreciated.

Sincerely,

Kevin J. O'Brien  
 General Manager, Hazmat Policy & Compliance

*G-MOS-3*  
*Log 2001-134*

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